

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

NOV 5 2015

IN THE MATTER OF:

Fiberdome, Inc.
Plant No. 2
865 Stoney Road
Lake Mills, Wisconsin 53551

ATTENTION:

Richard A. Wollin
President

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Fiberdome, Inc. (Fiberdome or you) to submit certain information about the facility at 865 Stoney Road, Lake Mills, Wisconsin. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Fiberdome owns and operates an emission source at the Lake Mills, Wisconsin facility. We are requesting this information to determine whether your emission source is complying with the CAA, the Title V Major Source Operation Permit issued to Fiberdome by the Wisconsin Department of Natural Resources, Permit No. 128049790-P30, the National Emission Standards

for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing at 40 C.F.R. Part 63, Subpart VVVV, and/or the NESHAP for Reinforced Plastic Composites Production at 40 C.F.R. Part 63, Subpart WWWW.

Fiberdome must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Fiberdome must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards, and limitations are not entitled to confidential treatment and shall be made available to

the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

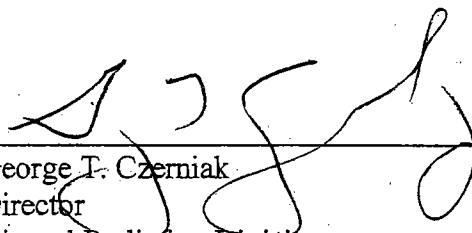
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Fiberdome to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Ray Cullen at (312) 886-0538.

11/3/15
Date


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information are not available or in your possession and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as a flash drive or other similar item.
4. Provide a table of contents for each flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to the response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each flash drive should be labeled appropriately (e.g., Company Name, Drive 1 of 4 for Information Request Response, Date of Response).
5. Documents or ESI claimed as confidential business information (CBI) must be submitted on separate drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

DEFINITIONS

All terms used in this request for information will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, 40 C.F.R. Part 52 (which incorporates the federally-approved State Implementation Plan), or the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, at 40 C.F.R. Part 63, Subpart VVVV. Reference is made to EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions, when appropriate. Definitional clarification is specified below.

1. The terms "document" and "documents" mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in hardcopy or computer format, memory, or storage device, or any other type of electronically stored information as defined in paragraph 2 below. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The term "electronically stored information" or "ESI" means any type of information that is stored in an electronic form and includes but is not limited to e-mails, web pages, word processing files, spreadsheets, PowerPoint presentations, audio and video files, databases, metadata, and any other type of information that is stored by electronic means, regardless of its form. ESI may be stored in computer memory, on magnetic disks (such as computer hard drives and floppy disks), optical discs (such as DVDs and CDs), flash memory (such as "thumb" or "flash" drives), network drives (such as F, G, and H drives), work desktops, laptops, home computers, portable hard drives, USB storage devices, smartphones and PDAs, portable media players, legacy storage devices (such as tapes, punch cards, disks or disk packs, zip disks or any other type of portable electronic storage media), and any other type of memory generally associated with computers and data

processing, together with the programming instructions and other written or electronic material necessary to use and access the information stored on such media.

3. The terms "relate to" or "pertain to" (or any form thereof) mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.
4. The term "atomized," in reference to a resin application method, as defined in 40 C.F.R. § 63.5779, means resin application technology in which the resin leaves the application equipment and breaks into droplets or an aerosol as it travels from the application equipment to the surface of the part. Atomized resin application includes, but is not limited to, resin spray guns and resin chopper spray guns.
5. The term "nonatomized," in reference to a resin application method, as defined in 40 C.F.R. § 63.5779, means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, pressure-fed resin rollers, resin impregnators, and hand application (for example, paint brush or paint roller).
6. The term "gel coat," as defined in 40 C.F.R. § 63.5779, means a thermosetting resin surface coating containing styrene or methyl methacrylate, either pigmented or clear, that provides a cosmetic enhancement or improves resistance to degradation from exposure to the elements. Gel coat layers do not contain any reinforcing fibers and gel coats are applied directly to the mold surfaces or to a finished laminate.
7. The term "clear gel coat," as defined in 40 C.F.R. § 63.5779, means gel coats that are clear or translucent so that underlying colors are visible, are used to manufacture parts for sale, and does not include tooling gel coats used to build or repair molds.
8. The term "pigmented gel coat," as defined in 40 C.F.R. § 63.5779, means opaque gel coats used to manufacture parts for sale and does not include tooling gel coats used to build or repair molds.
9. The term "production resin," as defined in 40 C.F.R. § 63.5779, means any resin used to manufacture parts for sale and does not include tooling resins used to build or repair molds or assembly adhesives.
10. The term "roll out," as defined in 40 C.F.R. § 63.5779, means the process of using rollers, squeegees or similar tools to compact reinforcing materials saturated with resin to remove trapped air or excess resin.
11. The term "skin coat," as defined in 40 C.F.R. § 63.5779, means a layer of resin and fibers applied over the gel coat to protect the gel coat from being deformed by the next laminate layers.

12. The term "tooling gel coat," as defined in 40 C.F.R. § 63.5779, means the gel coat used to build or repair molds or prototypes from which molds will be made.
13. The term "tooling resin," as defined in 40 C.F.R. § 63.5779, means the resin used to build or repair molds or prototypes from which molds will be made.
14. The term "vacuum bagging," as defined in 40 C.F.R. § 63.5779, means any molding technique in which the reinforcing fabric is saturated with resin and then covered with a flexible sheet that is sealed to the edge of the mold and where a vacuum is applied under the sheet to compress the laminate, remove excess resin, or remove trapped air from the laminate during curing. Vacuum bagging does not include processes that meet the definition of closed molding.
15. The term "vinylester resin," as defined in 40 C.F.R. § 63.5779, means a thermosetting resin containing esters of acrylic or methacrylic acid and having double-bond and ester linkage sites only at the ends of the resin molecules.

Appendix B

Fiberdome must submit the following information about the facility at 865 Stoney Road, Lake Mills, Wisconsin, pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within 30 calendar days of receipt of this letter:

1. For Processes P01 and P21 (chopper spray booths), P11 and P31 (gel coat spray booths), P41 (tooling booth), and P52 (hand lay-up open bay area) from January 1, 2011, to the date of receipt of this request, unless otherwise noted, provide:
 - A. The name and identification of each material used in each process; a statement of whether the material is a production resin, pigmented gel coat, clear gel coat, tooling resin, or tooling gel coat; and the application method used for each material in each booth (i.e., atomized; atomized, plus vacuum bagging with roll-out; atomized, plus vacuum bagging without roll-out; nonatomized; nonatomized, plus vacuum bagging with roll-out; or nonatomized, plus vacuum bagging without roll-out);
 - B. Copies of safety data sheets or the equivalent for every material used in each process;
 - C. If not identified in the safety data sheets provided in response to item 1(B), above, the percentage (by weight) of each volatile organic compound (VOC) and hazardous air pollutant (HAP) in each material used in each process;
 - D. Records showing the total amount (by weight) of each material used per process per month;
 - E. A copy of the operation manual for every type of spray gun used at the facility; and
 - F. A copy of daily records pertaining to pressure readings and pressure calibration for every spray gun used in each booth;
2. For all solvents, cleaning materials, and other miscellaneous VOC containing materials used at the facility and not otherwise identified in Item 1, above, provide:
 - A. The name and identification of each solvent, cleaning material, or other VOC containing material;
 - B. Copies of safety data sheets or the equivalent for every such solvent, cleaning material, or other VOC containing material;
 - C. If not identified in the safety data sheets provided in response to item 2(B), above, the VOC percentage (by weight) of each solvent, cleaning material, or other VOC containing material;

- D. Records showing the amount (by weight) of each material used at the facility per month;
3. A description of which method(s) Fiberdome uses to demonstrate compliance with the HAP emission limitation imposed by Permit No. 128049790-P30, Condition I.1.a.(1) and the Standards for Open Molding Resin and Gel Coat Operations, 40 C.F.R. § 63.5698(b) (i.e., emissions averaging, compliant materials, add-on controls);
4. For any materials that Fiberdome claims are exempt from the emission limit referenced in Item 3, above, provide:
- A. Records showing the amount of any production resins for which an exemption is claimed based on a requirement to meet specifications for use in military vessels or approval by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, or other life-saving appliances and applied using nonatomizing resin application equipment;
 - B. Records showing the amount of any gel coat used for part or mold repair and touch up for which an exemption is claimed and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used; and
 - C. Records showing the amount of any pure, 100 percent vinylester resin used for skin coats for which an exemption is claimed and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used;
5. If Fiberdome uses the Maximum Achievable Control Technology (MACT) model point value averaging (emissions averaging) to demonstrate compliance with the applicable emission limit referenced in Item 3, above, provide:
- A. Copies of the calculations performed each month using Equation 1 at 40 C.F.R. § 63.5710 to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit referenced in Item 3, above;
 - B. Copies of the calculations performed each month using Equation 2 at 40 C.F.R. § 63.5710 to compute the weighted-average MACT model point value (PV_{OP}) for each open molding resin and gel coat operation included in the average; and
 - C. Copies of the calculations performed using the equations in Table 3 to 40 C.F.R. Part 63, Subpart VVVV to compute the MACT model point value (PV_i) for each resin and gel coat used in each operation;
6. If Fiberdome uses one or more add-on control device(s) to demonstrate compliance with the applicable emission limit referenced in Item 3, above, provide:

- A. A description of each type of control device used;
 - B. Copies of the results of all performance tests conducted on each control device since installation of the control device; and
 - C. Copies of all records pertaining to monitored parameters of the control device;
- 7. Copies of monthly calculations for the actual and 12-month rolling average VOC emissions from the entire facility to demonstrate compliance with the VOC limitation imposed by Permit No. 128049790-P30, Condition I.2.a.(1), which qualifies the facility to be designated as a "synthetic minor source."
 - 8. For each process and associated control device (e.g., the collection filters associated with each booth) covered under Permit No. 128049790-P30, provide:
 - A. A copy of the Malfunction Prevention and Abatement Plan;
 - B. Records of all inspections, checks, and any maintenance or repairs performed, including logs which indicate the date(s) the filters were changed.
 - 9. A copy of the Implementation Plan for each of the open molding operations covered under Permit No. 128049790-P30 to address the method of compliance with 40 C.F.R. Part 63, Subpart VVVV, NESHAP for Boat Manufacturing.
 - 10. A copy of the Work Practice Plan to address work practices to minimize emissions of VOCs and to comply with the requirements of Table 4 to 40 C.F.R. Part 63, Subpart WWW, NESHAP for Reinforced Plastic Composites Production.

Appendix C

Confidential Business and Personal Privacy Information Assertion Requirements

You may assert a business confidentiality claim covering any part of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emissions data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emissions data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

If you wish to make a confidentiality claim, you shall submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the CAA, and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and that disclosure of the information is likely to cause substantial harm to your competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Your failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identifies as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in the answer to question 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to its detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for this assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. If there any other information you deem relevant to EPA's determination regarding its claim of business confidentiality?

If you receive a request for a substantiation letter from EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate personnel, medical, and similar files from the responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:


Richard A. Wollin
President
Fiberdome, Inc.
Plant No. 2
865 Stoney Road
Lake Mills, Wisconsin 53551

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Tom Roushar
Supervisor
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711

Bill Baumann
Chief
Compliance and Enforcement Section
Bureau of Air Management
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921 (AM/7)
Madison, Wisconsin 53707-7921

on the 5 day of November 2015.

 for

Kathy Jones
Program Technician
AECAB, PAS

Certified Mail Receipt Number: 7014 2870 0001 9581 3567